



Section 29. Decommissioning Plan.

In as much as the project is projected to cost over \$100 million to construct, \$800,000 to remove it and restore the mountain defies common sense.

The decommissioning plan states the "recycle value" of each turbine to be \$113,000 or about \$1000 per ton of weight. Current scrap prices for steel are at \$130.00 per ton; therefore, the prices stated in their permit plan for recycle and reclamation at \$113,658.42 per turbine are grossly overstated.

A more realistic figure is \$14,690 per turbine times 22 = \$323,180.

With today's figures, the total turbine decommissioning cost would be closer to \$2,946,020, not the \$768,714.68 as documented in their permit. Because these costs reflect today's prices, COLA needs to be included to cover the cost of the estimated project life (approximately 20 years).

On appendix 29.1 the headline reads: "**Decommissioning Costs Per Turbine W/ No Salvage Value**", yet they list **Recycling and reclamation \$-113,658.42**. What does this mean?

It appears they have understated the decommissioning cost by \$2.2 million dollars (\$100,000 x 22 turbines). A clarification of this issue is needed. If the turbines will be sold to be reconditioned some information about comparable sales needs to be provided. A misrepresentation of the cost of decommissioning would affect the cash flow projections of the project and impact its financial viability.

The fact that no funds are reserved at the beginning of the project is unacceptable because the language of RHW's decommissioning plan gives RHW freedom to abandon the project. This money needs to be set aside at the beginning of the project with a requirement for COLA adjustments.

Decommissioning will follow the standards set by the Maine Department of Environmental Protection (MDEP). Currently, these standards dictate that decommissioning will be required if the project has not generated electricity for a period of 12 continuous months, unless the company produces evidence of mitigating circumstances. Such evidence may include delays surrounding long lead time for spare part procurement, or a force majeure event that interrupts the generation of electricity. As used here, a "force majeure" event means instances such as fire, earthquake, flood, tornado, or other acts of God and natural disasters; strikes or labor disputes; war; any law, order, proclamation, regulation, ordinance, action, demand or requirement of any government agency; suspension of operations of all or a portion of the project for routine maintenance, overhaul, upgrade, or reconditioning; or any other act or condition beyond the reasonable control of Record Hill Wind LLC (RHW).

Wind turbines are unlike other structures that are normally permitted which do not require removal. No one will take over the wind facility, renovate it and find a new use for it as they would for a factory or commercial building. The appearance of non-functioning and unmaintained turbines on the ridge will be a blight on the landscape. The expedited permit area legislation permitting wind turbines to be erected without consideration of the aesthetic

impacts does not extend to abandoned turbines which are no longer functional.

RHW states that new turbines will likely replace the existing ones, but that is pure speculation, and does not address the cost of removing the existing turbines. When the turbines reach the end of their useful life they need to be removed and the funds to remove them should be escrowed at the outset, with interest payable to RHW. Bonds which need annual payments to remain in effect are not sufficient to protect the town's interests.

Testimony submitted by:

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and on behalf of Concerned Citizens to Save Roxbury

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